

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

REGINA LEWIS  
Plaintiff,

v.  
FCA US LLC.  
Defendant,

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Docket: 23Cv.2631 (PMH) (JCM)  
Motion Rule 56

PLEASE TAKE NOTICE, of plaintiff's Fourth Motion Rule 56. I see no rule that deprives me of filing a Rule 56 Motion at any time. (a) MOTION FOR SUMMARY JUDGMENT OR PARTIAL SUMMARY JUDGMENT. A party may move for summary judgment, identifying each claim or defense — or the part of each claim or defense — on which summary judgment is sought. The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court should state on the record the reasons for granting or denying the motion.

I have discussed the photos of the 2020 Jeep Grand Cherokee Vin: 1C4RJFAG8LC185498 with Rashaun Blakeney, who graduated from Pelion High School located at 600 Lydia Drive Pelion SC 29123, in June 2010, with a Certification in Mechanical Engineering specializing in HVAC.

Mr. Blakeney, reviewed the photos of the engine taken by Bosch Engineer Sydney Lewin, and he has determined that the missing Vent Tube along with deflected fuses are most likely responsible for the vehicle malfunction and cause of the sudden acceleration and Brake fade. A Vacuum brake is a braking system that uses the vacuum created by the engine to assist in applying the brakes and symptoms of air in the brake line, are:

- Spongy brakes: When air is in the brake lines, you may notice poor brake response to pedal travel. This is because air is compressible and does not provide the same level of friction as liquid brake fluid. It can also disrupt the hydraulic pressure in the brake lines, causing inconsistent braking performance.
- Ineffective braking: The loss of braking efficiency can lead to longer stopping distances and increased risk of accidents. You may notice poor brake response to pedal travel.
- Loose brake pedal: If you apply pressure on the brake pedal and feel air, it means there is air in the brake lines. This can occur if the brake lines are leaking or if the master cylinder is failing.

Plaintiff's "fourth Rule 56 Motion" (Doc. 81) is denied for, *inter alia*, failure to comply with the Court's Individual Practices, the Federal Rules of Civil Procedure, and the Local Civil Rules.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
June 10, 2024

Unless your vehicle has an air brake system, air in the brake line is a serious issue that you should address immediately, because (1), when applying pressure to the brake pedal, it acts as a lever that amplifies the power by up to six times. This pressure travels from the master cylinder, through the brake line, and acts on the brake caliper and brake rotor. (2), if air bubbles are in the brake line, hydraulic pressure is reduced, making your entire braking system less effective and your vehicle more difficult to control. This can lead to accidents, harming you and others around you.”

The missing Vent Tube is also responsible for the Brake Booster losing the Vacuum and for causing the Brake Pad to bend in the Calipher resulting in the vehicle accelerating rather than stopping when the brakes were pushed. In the pictures it is obvious that there was air in the line. The fuses are also deflected, which has caused an electrical problem resulting in the inability to properly diagnose the issues prior to the accident.

Because Sidney Lewin, specifically took a number of photos of the missing Vent Tube, this fact is known by the defendants. The loose wires and deflected fuses and overall appearance of the engine indicates that the engine is no good and has been repaired in the past maybe more than once. The Vent Tube is essentially the starter that allows the air and the heat to pass though the vents properly. This is why I smelled a noxious odor just before the accident. This was discussed during deposition with Heather Fine.

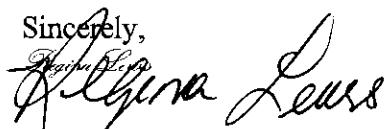
“To ensure the brake fluid level in the reservoir is adequate to prevent a void that allows air to enter. Only open the brake fluid reservoir when you need to add fresh fluid or replace old fluid. Check the tightness and condition of the bleeder screws frequently to prevent air entry. Follow your maintenance plan and take care of your brake components (brake hose, brake lever, brake line, etc.) as required. To slow down buildup in the brake lines, ensure the brake fluid level in the reservoir is adequate to prevent a void that allows air to enter. Ensure the brake fluid level in the reservoir is adequate to prevent a void that allows air to enter. Only open the brake fluid reservoir when you need to add fresh fluid or replace old fluid. Check the tightness and condition of the bleeder screws frequently to prevent air entry. Follow your maintenance plan and take care of your brake components (brake hose, brake lever, brake line, etc.) as required.”

According to AutoZone, (1), Only open the brake fluid reservoir when you need to add fresh fluid or replace old fluid. (2), Check the tightness and condition of the bleeder screws frequently to prevent air entry. (3), Follow your maintenance plan and take care of your brake components (brake hose, brake lever, brake line, etc.) as required. (4), The braking force on internal combustion engine-

powered vehicle is amplified to many times the effort you put in with your foot pressure. The brake booster, or brake power booster, is a component that uses your vehicle's engine vacuum – or negative pressure – to assist you with braking effort. It's mounted in the engine compartment against the firewall in front of the driver. (5), While it's not a common occurrence, a brake booster can fail. When it does, it can make your car scary and unsafe to drive. It's not the least expensive component under your hood either, and most are between \$75 and \$300 for the parts, plus you'll need it installed. (6), The brake booster is often completely forgotten about, but if it fails, you'll need to get it fixed fast.

Apparently, any mechanic could have diagnosed this because Sidney Lewin surely did. The leaking fluid lines are responsible for the moisture on the engine and the missing Vent Tube is responsible for the air in the brake line. The fuses are also deflected, which is reason for the electrical problem responsible for the false reading of the EDR Download. The defendant, State Farm and dealership is liable. John Owens failed to maintain his vehicle. This is the gravamen and this is my fourth Rule 56 Motion. If the defendants had any sense they would hire Mr. Blakeney.

Sincerely,



cc:

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